



PHILIP L. BROWNING
Director

**County of Los Angeles
DEPARTMENT OF CHILDREN AND FAMILY SERVICES**

425 Shatto Place, Los Angeles, California 90020
(213) 351-5602

November 27, 2012

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To: Supervisor Zev Yaroslavsky, Chairman
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From: Philip L. Browning
Director

A handwritten signature in purple ink, appearing to be "P. Browning", is written over the printed name and title of the sender.

**SECURE TRANSITIONS, INC., FOSTER FAMILY AGENCY CONTRACT COMPLIANCE
MONITORING REVIEW**

The Department of Children and Family Services (DCFS) Out-of-Home Care Management Division (OHCMD) conducted a review of Secure Transitions, Inc., Foster Family Agency (Secure Transitions) in April 2011, at which time they had 21 children in ten certified foster homes. The placed children's overall average length of placement was four months and the average age was 10.

Secure Transitions is located in the Second Supervisorial District and provides services to Los Angeles County DCFS foster youth. According to Secure Transitions' program statement, its stated mission is "to develop and support a network of certified foster parents that provides "secure bases" or living environments that promote the healthy development of children and their safe return to their families of origin. Overall, our goal is to assist attachment-disordered children toward increased feelings of self-worth, increased self-control, and toward an increased capacity for becoming "attached" or bonded with a significant other." Secure Transitions is licensed to serve children ranging from birth through 17.

For the purpose of this review, six children's files were reviewed and five children were interviewed in three certified foster homes. Three certified foster parent files, four

discharged children's files and five staff files were reviewed for compliance with Title 22 regulations and the County contract requirements.

One placed child was prescribed psychotropic medication. We reviewed her case file to assess timeliness of Psychotropic Medication Authorizations (PMAs), and to confirm documentation of psychiatric monitoring was maintained as required.

SCOPE OF REVIEW

The purpose of this review was to assess Secure Transitions' compliance with the County contract requirements and State regulations. The visit included a review of the Agency's program statement, administrative internal policies and procedures, six placed children's case files, one child's psychotropic medication file, three certified foster parent files, four discharged children's files and five personnel files. Face-to-face visits and interviews were conducted with three certified foster parents to assess the quality of care and supervision provided to the children and we conducted interviews with five children to assess the care and services they were receiving.

A copy of this report has been sent to the Auditor-Controller (A-C) and Community Care Licensing (CCL).

SUMMARY

During our review, interviewed children reported feeling safe, having been provided with appropriate care and services, being comfortable in their environment and treated with respect and dignity.

The deficiencies noted during the monitoring review were related to Certified Foster Homes documentation issues; a few physical plant deficiencies, which did not pose any safety risks; documentation issues in the areas of Needs and Services Plans (NSPs) and Education and Workforce Readiness. Also noted, three children did not receive the required weekly allowance. Further, some Agency social work staff did not meet the required educational experience and were working under the licensure and supervision of the Program Administrator. Lastly, there were documentation issues related to the staff files.

Based on our review, Secure Transitions needs to implement better controls over documentation in certified foster parent and children's case files and improve the supervision and training of the social work staff.

Secure Transitions agreed with the review findings and recommendations and were receptive to implementing systemic changes to improve their compliance with regulatory standards.

NOTABLE FINDINGS

The following are the notable findings of our review:

- Of the three certified foster homes visited, a safety inspection/evaluation had not been completed prior to recertification for one certified foster parent. In addition, there was no health-screening or copy of the current driver's license for the certified foster parent's adult daughter who resides in the home. The Executive Director stated that a member of his staff has now been trained to conduct quality assurance visits each month as to safety inspections. In regards to other adults residing in the home, the Executive Director stated he will ensure this requirement is met.
- Of the three certified foster homes visited, two homes had a large amount of debris in the backyard. In one home, the hallway air vent was dirty, the ceiling fan in bedroom #1 was dirty, the carpet was dirty in bedroom #2, there was a broken light switch and the paint was peeling on the ceiling. In another home, one bedroom was extremely messy. The Executive Director reported that the Agency has now trained an employee to conduct quality assurance visits each month to certified foster homes in order to address physical plant issues and assist the certified foster parents with physical plant compliance.
- Of the six foster children's files reviewed, the Needs and Services Plans (NSPs) did not have the DCFS Children's Social Workers' (CSWs') signatures authorizing the implementation of the NSPs, and the children and certified foster parents were not included in the development of the NSPs. There was no documentation that three children were progressing toward meeting the NSP goals. An initial NSP for one child was not timely. The treatment team was not included in the development of the initial NSPs for four of the children and monthly contacts with the CSWs were not documented. In addition, the treatment team did not develop timely or comprehensive updated NSPs. The Executive Director reported the Agency Supervising Social Workers will monitor for compliance. Additionally, Secure Transitions representatives did not attend the NSP training conducted by OHCMD in January 2012. OHCMD has concerns regarding the quality of the NSPs and will conduct the next Contract Compliance Review in August 2012, to verify if the Agency has improved the quality of the NSPs.
- Of the five school-aged placed children's files reviewed, there was no documentation regarding one child's increased academic performance since placement and current copies of report cards/progress reports were not maintained in the children's case files. The Executive Director reported that Agency Social Workers have been instructed to document the academic progress of each child in the Quarterly Reports. The Agency Technical Assistant

(TA) will track and submit a report to the Supervising Social Worker at the end of each term and semester to obtain missing progress reports.

- Of the five foster children interviewed, three children reported that they did not receive the required minimum weekly allowance. They reported that sometimes their allowance was withheld as a form of discipline. The Executive Director reported that this had been brought to his attention by one child and that he has met and discussed the issue with the certified foster parent.
- Of the five staff files reviewed, four social work staff members did not meet the Educational/Experience requirements. They had the job classification of intern and were working under the licensure and supervision of the Executive Director and Program Administrator. One staff member did not have a valid California Driver's License. None of the staff members had signed copies of the Agency's policies and procedures. Four staff members had no documentation of the required initial training in their files. There was no documentation that the staff members had received the minimum one-hour training in the area of child abuse identification and reporting. There was no documentation that three of the staff members received the required on-going training. The Executive Director stated that the Agency would ensure that documentation was maintained and training is provided.

The detailed report of our findings is attached.

EXIT CONFERENCE

The following are highlights from the Exit Conference held August 17, 2011.

In attendance:

Melvin Moore, PhD., Executive Director Secure Transition, Inc., FFA and Greta Walters, Monitor, DCFS OHCMD.

Highlights:

The Executive Director expressed an understanding of our findings and recommendations. He indicated that the Agency would make the necessary corrections and take care of the findings presented.

Secure Transitions submitted an approved written Corrective Action Plan (CAP), which addressed each recommendation noted in the compliance report. The approved CAP is attached.

Each Supervisor
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We will assess for full implementation of recommendations during our next monitoring review.

If you have any questions, please call me or your staff may contact Aldo Marin, Board Relations Manager at (213) 351-5530.

PLB:RRS:KR:
EAH:Nf:gfw

Attachments

- c: William T Fujioka, Chief Executive Officer
Wendy Watanabe, Auditor-Controller
Public Information Office
Audit Committee
Melvin Moore, PhD. Executive Director, Secure Transitions, Inc., FFA
Jean Chen, Regional Manager, Community Care Licensing

**SECURE TRANSITIONS, INC., FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW SUMMARY**

**5711 West Slauson Avenue, Suite 250
Culver City, CA 90230
License Number: 197805297**

	Contract Compliance Monitoring Review	Findings: April 2011
I	<u>Licensure/Contract Requirements</u> (6 Elements) <ol style="list-style-type: none"> 1. Timely Notification for Child's Relocation 2. SIRs Documented and Cross-Reported 3. Runaway Procedures 4. Community Care Licensing Citations, Out-of-Home Care Management Division Reports on Safety and Physical Deficiencies 5. If Applicable, FFA Ensures Complete Required Whole Foster Family Home Training 6. FFA pays Certified Foster Parents Whole Foster Family Home Payments 	Full Compliance (ALL)
II	<u>Certified Foster Homes</u> (13 Elements) <ol style="list-style-type: none"> 1. Home Study Prior to Certification 2. Contact with References/Including Check with OHCMD 3. Safety Inspection Prior to Certification 4. Timely DOJ, FBI, CACI 5. Health-Screening Prior to Certification 6. Required Training Prior to Certification 7. Current Certificate of Approval on File Including Capacity 8. Home Inspection/Evaluations for Re-certification 9. Completed Training Hours for Re-certification 10. CPR/First-Aid/Water Safety Certificates 11. CDL/Auto Insurance 12. Other Adults: DOJ/FBI/CACI/Other Required Docs 13. Transportation 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Needs Improvement 9. Full Compliance 10. Full Compliance 11. Full Compliance 12. Needs Improvement 13. Full Compliance

III	<p><u>Facility and Environment</u> (8 Elements)</p> <ol style="list-style-type: none"> 1. Exterior Well Maintained 2. Common Areas Maintained 3. Children's Bedrooms/Interior Maintained 4. Sufficient Recreational Equipment 5. Sufficient Educational Resources 6. Adequate Perishable and Non Perishable Food 7. Disaster Drills Conducted 8. Allowance Logs 	<ol style="list-style-type: none"> 1. Needs Improvement 2. Needs Improvement 3. Needs Improvement 4. Full Compliance 5. Full Compliance 6. Full Compliance 7. Full Compliance 8. Full Compliance
IV	<p><u>Maintenance of Required Documentation and Service Delivery</u> (11 Elements)</p> <ol style="list-style-type: none"> 1. DCFS CSW Authorization to Implement NSPs 2. Children's Participation in the Development of NSPs 3. NSPs Implemented and Discussed with Foster Parents 4. Children's Progress Towards Meeting Goals 5. Timely Developed Initial NSPs with Child 6. Comprehensive Initial NSPs with Child 7. Therapeutic Services Received 8. Recommended Assessments/Evaluations Implemented 9. DCFS CSWs Monthly Contacts Documented 10. Timely Developed Updated NSPs with Child 11. Comprehensive Updated NSPs with Child 	<ol style="list-style-type: none"> 1. Needs Improvement 2. Needs Improvement 3. Needs Improvement 4. Needs Improvement 5. Needs Improvement 6. Needs Improvement 7. Full Compliance 8. Full Compliance 9. Needs Improvement 10. Needs Improvement 11. Needs Improvement
V	<p><u>Education and Workforce Readiness</u> (7 Elements)</p> <ol style="list-style-type: none"> 1. Children Enrolled in School Within Three Days 2. Children Attended School as Required 3. Agency Facilitates Child's Educational Goals 4. Child's Academic and/or Attendance Increase 5. Current IEPs Maintained 6. Current Report Cards Maintained 7. Agency Facilitates Child's Participation in YDS/Equivalent/Vocational Programs 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Needs Improvement 5. Not Applicable 6. Needs Improvement 7. Full Compliance

VI	<u>Health and Medical Needs</u> (6 Elements) <ol style="list-style-type: none"> 1. Initial Medical Examinations Conducted 2. Initial Medical Examinations Timely 3. Follow-up Medical Examinations Timely 4. Initial Dental Examinations Conducted 5. Initial Dental Examinations Timely 6. Follow-up Dental Examinations Timely 	Full Compliance (ALL)
VII	<u>Psychotropic Medications</u> (2 Elements) <ol style="list-style-type: none"> 1. Current Court Authorization for Administration of Psychotropic Medication 2. Current Psychiatric Evaluation Review 	Full Compliance (ALL)
VIII	<u>Personal Rights and Social/Emotional Well-Being</u> (13 Elements) <ol style="list-style-type: none"> 1. Children Informed of Foster Home's Policies and Procedures 2. Children Feel Safe 3. Satisfaction with Meals and Snacks 4. Foster Parents Treatment of Children with Respect and Dignity 5. Appropriate Rewards and Discipline System 6. Children Allowed Private Visits, Calls, and Correspondence 7. Children Free to Attend Religious Services/Activities 8. Reasonable Chores 9. Children Informed About Psychotropic Medication 10. Children Aware of Right to Refuse Psychotropic Medication 11. Children Informed About Voluntary Refusal of Medical and Dental Care 12. Children Participation in At-Home, School, Community Activities 13. Children Participation in Extra-Curricular Activities 	Full Compliance (ALL)

IX	<u>Personal Needs/Survival and Economic Well-Being</u> (8 Elements) <ol style="list-style-type: none"> 1. \$50 Clothing Allowance 2. On-going Clothing Inventories of Adequate Quantity 3. On-going Clothing Inventories of Adequate Quality 4. Involvement in Selection of Clothing 5. Provision of Personal Care Items 6. Minimum Monetary Allowances 7. Management of Allowance 8. Encouragement and Assistance with Life Book/Photo Album 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Full Compliance 6. Needs Improvement 7. Full Compliance 8. Full Compliance
X	<u>Discharge Children</u> (3 Elements) <ol style="list-style-type: none"> 1. Stabilization of Placement Prior to Discharge 2. Discharge Summary Completed 3. Child Completed High School 	Full Compliance (All)
XI	<u>Personnel Records</u> (14 Elements) <ol style="list-style-type: none"> 1. DOJ Timely Submitted 2. FBI Timely Submitted (After January 1, 2008) 3. CACIs Timely Submitted 4. Signed Criminal Background Statement Timely 5. Education/Experience Requirement 6. Employee Health-Screening Timely 7. Valid Driver's License 8. Signed Copies of FFA Policies and Procedures 9. Initial Training Documentation 10. One-hour Training of Child Abuse Reporting 11. CPR Training Documentation 12. First-Aid Training Documentation 13. On-going Training Documentation 14. Social Workers Appropriate Case Ratio 	<ol style="list-style-type: none"> 1. Full Compliance 2. Full Compliance 3. Full Compliance 4. Full Compliance 5. Needs Improvement 6. Full Compliance 7. Needs Improvement 8. Needs Improvement 9. Needs Improvement 10. Needs Improvement 11. Full Compliance 12. Full Compliance 13. Needs Improvement 14. Full Compliance

**SECURE TRANSITIONS, INC., FOSTER FAMILY AGENCY
CONTRACT COMPLIANCE MONITORING REVIEW**

**5711 West Slauson Avenue, Suite 250
Culver City, CA 90230
License Number: 197805297**

The following report is based on a "point in time" monitoring visit. This compliance report addresses findings noted during the April 2011 monitoring review.

CONTRACTUAL COMPLIANCE

Based on our review, Secure Transitions was in full compliance with six of 11 sections of our contract compliance review: Licensure/Contract Requirements; Health and Medical Needs; Psychotropic Medication; Personal Rights and Social/Emotional Well-Being and Discharged Children. The following report details the results of our review.

CERTIFIED FOSTER HOMES

Based on our review of three certified foster parents' case files and/or documentation from the provider, Secure Transitions was in full compliance with 11 of 13 elements reviewed in the area of Certified Foster Homes.

We noted a home inspection/evaluation had not been completed prior to the re-certification for one certified foster parent. In addition, there was no health-screening or copy of the current driver's license for the certified foster parent's adult daughter who resides in the home. The Executive Director stated that a member of his staff has been trained to conduct quality assurance visits each month. The Executive Director stated that he would ensure that this requirement is met also for the other adults residing in the home.

Recommendations:

Secure Transitions management shall ensure that:

1. Home inspections/evaluations are completed before re-certification.
2. Health-screenings are conducted and copies of current driver's licenses are maintained for all adults residing in certified foster homes.

FACILITY AND ENVIRONMENT

Based on our review of three certified foster parents' homes, Secure Transitions was in full compliance with five of eight elements reviewed in the area of Facility and Environment.

We noted that at two of the homes, there was a large amount of debris in the backyards. In one home, the hallway air vent was dirty; in bedroom #1, the ceiling fan was dirty and the carpet was dirty in bedroom #2, there was a broken light switch and the paint was peeling on the ceiling. In another home, one of the bedrooms was extremely messy. The Executive Director reported that the Agency has trained an employee to conduct quality assurance visits each month to the certified foster homes in order to address physical plant issues and assist the certified foster parents with physical plant compliance.

Recommendations:

Secure Transitions management shall ensure that:

3. The exteriors of certified foster homes are maintained.
4. The common areas of certified foster homes are maintained.
5. Children's bedrooms/interiors are maintained

MAINTAINANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

Based on our review of six children's case files and/or documentation from the provider, Secure Transitions was in full compliance with two of 11 elements reviewed in the area of Maintenance of Required Documentation and Service Delivery.

It was noted that the NSPs did not have CSWs' signatures authorizing implementation and children and certified foster parents were not included in the development of the NSPs. There was no documentation that three children were progressing toward meeting their NSP goals and an initial NSP for one child was not timely. Further, the treatment team was not included in the development of the initial NSPs for four of the children.

We also noted that Secure Transitions Social Workers did not document monthly contacts with the CSWs. In addition, the treatment team did not develop timely or comprehensive updated NSPs.

The Executive Director stated that the Agency Social Worker Supervisors would no longer accept any NSPs that were not comprehensive and that did not contain all required elements. Further, the Agency Technical Assistant had been instructed not to mail out those NSPs that did not have the certified foster parents' signatures. Agency Social Worker Supervisors will monitor for compliance. Additionally, Secure Transitions representatives did not attend the NSP training conducted by OHCMD in January 2012. OHCMD has concerns regarding the quality of the NSPs and will conduct the next Contract Compliance Review in August 2012, to verify if the Agency has improved the quality of the NSPs.

Recommendations:

Secure Transitions management shall ensure that:

6. Documentation is maintained as verification of the CSWs approval for implementation of NSPs.
7. The children are included in the development of NSPs.
8. The certified foster parents are included in the development of NSPs.
9. Children's progress towards meeting NSP goals is documented.
10. Initial NSPs are timely.
11. Initial NSPs are comprehensive and include all required elements.
12. Monthly contacts with the CSWs are documented in NSPs.
13. Updated NSPs are timely.
14. Updated NSPs are comprehensive and include all required elements.

EDUCATION AND WORKFORCE READINESS

Based on our review of six children's case files and/or documentation from the provider, Secure Transitions was in full compliance with five of seven elements reviewed in the area of Education and Workforce Readiness.

We noted there was no documentation for one child's increase in academic performance since placement and current copies of report cards were not maintained in the children's case files. The Executive Director reported that Agency Social Workers have now been instructed to document the academic progress of each child in the Quarterly Reports. The Agency Technical Assistant (TA) will now track and submit a report to the Agency Supervising Social Worker at the end of each term and semester to obtain missing progress reports.

Recommendations:

Secure Transitions management shall ensure that:

15. All efforts made in assisting children in increasing their academic performance is documented and maintained in their case files.
16. Current copies of the children's report cards are maintained.

PERSONAL NEEDS/SURVIVAL AND ECONOMIC WELL-BEING

Based on our review of six children's case files and/or documentation from the provider, Secure Transitions was in full compliance with seven of eight elements reviewed in the area of Personal Needs/Survival and Economic Well-Being.

We noted that three reviewed children reported that they did not receive the required minimum weekly allowance. They reported that their certified foster parent sometimes withheld their allowance as a form of discipline. The Executive Director reported that this had been brought to his attention by one of the children and that he has met and discussed the issue with the certified foster parent.

Recommendation:

Secure Transitions management shall ensure that:

17. Children receive the required weekly allowance.

PERSONNEL RECORDS

Based on our review five staff personnel files, Secure Transitions fully complied with eight of 14 elements in the area of Personnel Records.

We noted that four social work staff members did not meet the Educational/Experience requirements. They had the job classification of intern and were working under the licensure and supervision of the Executive Director and Program Administrator. One staff member did not have a valid California Driver's License. The Executive Director reported that the person was no longer employed by the Agency. None of the staff members had signed copies of the Agency's policies and procedures. Four staff members had no documentation of required initial training in their files. There was no documentation that the staff members had received minimum one-hour training in the area of child abuse identification and reporting. There was no documentation that three staff members received the required on-going training. The Executive Director stated that he would ensure that training is provided to all staff members.

Recommendations:

Secure Transitions management shall ensure that:

18. All staff members meet the educational/experience requirements.
19. All staff members have current California Driver's Licenses.
20. Signed copies of the Agency's policies and procedures are maintained in staff members' files.

21. All staff members have initial training as required per Title 22 Regulations and the Foster Family Agency's program statement.
22. All staff members have one-hour training of Child Abuse Reporting.
23. All staff members have on-going training as required per Title 22 Regulations and the Foster Family Agency's program statement.

PRIOR YEAR FOLLOW-UP FROM THE AUDITOR-CONTROLLER'S COMPLIANCE REVIEW REPORT

The A-C's last compliance report was issued May 12, 2011.

Objective

Determine the status of the recommendations reported in the A-C's prior compliance review.

Verification

We verified whether the outstanding recommendations from the A-C's last compliance review dated May 12, 2011 were implemented.

Results

The A-C completed their review during October 2008, and a follow-up in March 2010, resulting in one report dated May 12, 2011. The A-C's prior monitoring report contained 12 outstanding findings. Specifically, Secure Transitions was to ensure that in the area of Foster Parent Certification, that assessments were completed for homes where more than two children were placed and that foster parents' files had all required documentations; that the NSPs are timely, comprehensive and address all elements; that children meet the age criteria for services; that children and the CSWs are informed of the Agency's policies and procedures; the children's dental examinations are conducted timely; and in the area of Staffing/Caseloads, the Agency is to ensure that the contracted social workers sign declarations stating that their combined caseloads at all agencies do not exceed 15 children.

The A-C conducted their follow-up in March 2010. During that review it was found that Secure Transitions had not fully implemented all of the outstanding recommendations from the A-C's October 2008 review, as NSPs were still not comprehensive and did not contain all required elements; children did not meet the age criteria; and dental examinations were not conducted timely.

Based on our follow-up of these recommendations, Secure Transitions did not fully implement all the outstanding recommendations from the A-C's contract review of May 12, 2011. Secure Transitions did not implement the recommendations regarding the NSPs being comprehensive and containing all elements. Further corrective action was requested to address these findings. OHCMD will conduct the next Contract Compliance Review in August 2012.

Secure Transitions management shall ensure that:

24. They implement the one outstanding recommendation from the May 12, 2011 monitoring report, which is noted in this report as Recommendations to the NSPs.

MOST RECENT FISCAL REVIEW CONDUCTED BY THE AUDITOR-CONTROLLER

A fiscal review of Secure Transitions was posted on August 18, 2004. The A-C identified \$11,967 in unsupported/inadequately supported costs and \$5,504 in unallowable FFA expenditures. Also noted, Secure Transitions did not name the County as an additional insured on its General Liability insurance policy as required under its contract with the County. As a result the County incurred approximately \$211,000 in legal cost defending itself in a case involving an injury to a foster child. The A-C recommended that DCFS and County Counsel evaluate the possibility of recovering these legal costs from the Agency. The A-C's fiscal report also noted that DCFS resolve the identified expenditures and if appropriate, collect all disallowed amounts and ensure that Secure Transitions management takes the appropriate corrective action to address the recommendations in the A-C's report and monitor to ensure that the corrective actions taken result in permanent changes. Secure Transitions submitted a fiscal CAP and it is monitored by DCFS Fiscal Monitoring Section. According to DCFS Fiscal Monitoring Section, Secure Transitions is not current with their repayment plan.

SECURE

TRANSITIONS, Inc.
A Foster Family Treatment Agency

5711 W. SLAUSON AVENUE, SUITE 250 CULVER CITY, CA 90230 (310) 342-3950 / FAX (310) 342-3955

February 11, 2012

Greta F. Walters
Children's Administrator I
Department of Children and Family Services
Out-of-Home Management Division
Foster Family Agency Performance management
9320 Telstar Avenue, Suite 216
El Monte, CA 91731

Dear Ms. Walters:

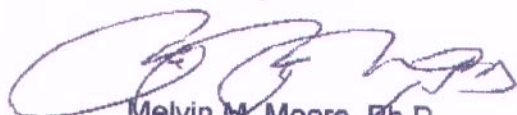
Per your request, the Corrective Action Plan (CAP) accompanying this letter is responsive to the Foster Family Agency Monitoring Review held during August 2011.

Please accept our apology for the lateness of this CAP. Due to some confusion on the agency's part, this CAP was not submitted timely as it was requested at a time when the agency was awaiting a response from the Department regarding an earlier monitoring review for which there was no closure. The currently requested CAP was confused with that earlier review.

We have done our best to respond to the deficiencies indicated during the exit interview conducted on August 17, 2011; most of these deficiencies have long been corrected, however, because of the lapse of time between the exit interview and your recent request, it is not possible to be as specific as we would like. Finally, most of the deficiencies cited during your exit interview were corrected in response to an earlier review by Elaine Clark, another reason for the confusion.

If additional information is needed please contact me at (310) 342-3950.

Yours truly,



Melvin M. Moore, Ph.D.
Executive Director

Secure Transitions Foster Family Agency

Facility Number: 197805486

Corrective Action Plan

February 10, 2012

II. CERTIFIED FOSTER HOMES

Question # 14:

Were safety inspections and re-evaluations completed at least every six months or per the timelines approved in the agency's program statement?

Finding:

In one out of three homes this was not done.

Agency Response:

Safety inspections and re-evaluations are normally conducted at least every six months or per the timelines approved in Secure Transitions' program statement. The agency endeavors to follow its policies and guidelines, sometimes oversights occur; the cited deficiency marks one such time this occurred.

Safety inspections will be routinely conducted as a part of all re-certifications. A member of our staff has been trained to conduct quality assurance (safety checks) visits each month; a minimum of two foster family homes will be inspected each month, with homes of certified parents needing re-certification being a priority.

The Executive Director will ensure that safety inspections of all certified foster homes being re-certified are conducted and the appropriate documentation is maintained in each certified foster parent's Quality Assurance file.

Question # 18:

Do additional adults who reside in the home (adult children of foster parents, other family members and baby sitters, have all the necessary information in the certified foster parent's file (i.e., criminal clearances, valid driver's license, auto insurance, etc.)?

Finding:

There was one parent file reviewed that did not meet this requirement.

Agency Response:

All certified foster parent's agency caregivers and adults who reside in the foster family home are required to be fingerprint cleared (DOJ/FBI, Child Abuse), be current CPR/First Aid trained, have recent health screen and other documentation

depending on their involvement in child care and supervision (current driver's license, auto registration, auto insurance, Caregiver Driver Agreement). The agency's Executive Director will monitor to ensure that this requirement is met.

Note by Evaluator: No documentation of Safety Inspection or Evaluation prior to current recertification for CFP-Salazar. No health screening or current driver's license for the daughter of CFP Salazar.

Mrs. Salazar was to be de-certified on November 26, 2011 for a number of reasons, one being negligent with respect to submission of documentation in a timely fashion. The de-certification was delayed in a response to a request by Community Care Licensing; CCL wanted to conduct an investigation the home based on our complaint before Mrs. Salazar was decertified. Mrs. Salazar's decertification will now proceed.

III. FACILITY AND ENVIRONMENT

Question # 20:

Are the exterior and the grounds of the certified foster home well maintained? (front and back yards clean, and adequately landscaped, condition of home exterior, drives walkways and fences, window screens)?

Finding:

One out of two homes visited had deficiencies of some kind.

Agency Response:

In order to address physical plant issues and assist our certified parents with physical plant compliance, one of our employees is trained to conduct quality assurance visits; a minimum of two safety inspections will be conducted each month.

Question # 21:

Are common quarters well maintained (Clean/sanitary, neat adequate furniture and lighting; home-like environment; no safety hazards)?

Finding:

At least one deficiency was found in one out of two homes visited.

Agency Response:

In order to address physical plant issues and assist our certified parents with physical plant compliance, one of our employees is trained to conduct quality assurance visits; a minimum of two safety inspections will be conducted each month. One of the issues he will address is the condition of each room in the foster family home, i.e., for cleanliness, neatness, adequate lighting, safety hazards, adequate furniture, etc.

Question # 22:

Are children's bedrooms well maintained? (Clean/sanitary, neat, comfortable, adequate lighting, window coverings and storage space, beds, mattresses, furniture, flooring, full complement of linens on beds, age-appropriate decorations, and appropriate sleeping arrangements)

Finding:

At least one deficiency was found in two out of two homes visited.

Agency Response:

As mentioned above: in order to address physical plant issues and assist our certified parents with physical plant compliance, one of our employees is trained to conduct quality assurance visits; a minimum of two safety inspections will be conducted each month. One of the issues he will address is the condition of each room in the foster family home, i.e., for cleanliness, window coverings, storage space, adequate mattresses and linens/bedding, age-appropriate decorations, appropriate sleeping arrangements, neatness, adequate lighting, safety hazards, adequate furniture, etc.

IV. MAINTENANCE OF REQUIRED DOCUMENTATION AND SERVICE DELIVERY

Question # 28:

Did the FFA obtain the DCFS CSW's authorization or document effort to obtain their implementation of the Needs and services Plan?

Finding:

The agency was cited in five out of five instances where it failed to obtain the CSW authorization to implement the developed Needs and Services Plan.

Agency Response:

To correct this problem, the agency has implemented the following: the Technical Assistant who mails Needs & Services Plans to County Social Workers will keep a log of mailed Plans and to whom they were mailed.

At the end of each month, the names of all non-responding CSW's will be given to the Executive Director who will then direct the TA or agency social worker to contact the non-responding CSW by telephone and re-request approval or non-approval of the submitted Plan.

Question # 29:

Do-age appropriate children participate in the development of the Needs and Services Plan?

Finding:

The agency was cited in five out of five instances where there was no indication that children participated in the development of the Needs and Services Plan.

Agency Response:

Secure Transitions requires that its social workers have placed children participate in the development of the Needs and Services Plan, if age-appropriate. The likelihood of this deficiency being repeated has been greatly reduced by stricter supervision of social work staff work and documentation. As of his writing, the Social Worker Supervisor no longer accepts Plans for which there is no collaboration with a foster child. In the cases cited, an agency social worker left the employ of the agency, submitted work late, and without any indication that the child for whom the Plan was developed participated in its development. Because the work mentioned above was submitted late, it was forwarded to the appropriate CSW to prevent even further delay.

Question # 30:

Do certified foster parents participate in development of the NSP?

Finding:

The agency was cited in six out of six instances where there was no indication that the certified foster parent participated in the development of the Needs and Services Plan.

Agency Response:

Secure Transitions requires that its social workers have certified foster parents participate in the development of the Needs and Services Plans. The likelihood of this deficiency being repeated has been prevented by stricter supervision of social work staff work and documentation. The Social Worker Supervisors no longer accepts Plans for which there is no collaboration indicated between agency social worker and certified foster parent. Additionally, agency social workers have been instructed not to mail Needs and Services Plans to CSW's, but instead, give to the Technical Assistant (TA) for mailing. The Technical Assistant has also been instructed not to mail any Needs and Services Plan that does not have a child's or certified foster parent's signature. Instead, the TA will return to the agency social worker any Needs and Services Plan that does not have a certified foster parent's signature.

In the cases cited, however, an agency social worker left the employ of the agency, submitted work late, and without any indication that neither the child for whom the Plan was developed nor the child's foster parent participated in its development. Because the work was submitted late, the Plans were forwarded to the appropriate CSW to prevent even further delay.

Question # 31:

Are the placed children progressing toward meeting the Needs and Services Plans case goals?

Finding:

The evaluator indicated that in three out of six cases reviewed, placed children did not appear to be progressing toward meeting the Needs and Services Plans case goals.

Agency Response:

Given the lapse of time between the exit interview and the recent request for a CAP, the agency is unable to determine for which children this was a deficiency pertained. Nevertheless, to ensure that placed children all make significant progress toward achieving the goals specified in their Needs and Services Plans, agency social workers will develop achievable goals, through collaboration; gain each certified parent and placed child's agreement and commitment to developed goals; and, monitor during home visits, that steps toward achieving agreed upon goals are being made. The Supervising Social Worker will monitor for compliance.

Question # 32

Did the treatment team develop timely initial Needs and Services Plans with the child?

Finding:

In one out of six cases, the agency failed to develop timely initial Needs and Services plans with a placed child.

Agency Response:

The agency has addressed the problem of late submission of initial Needs and Services Plans by increased monitoring and follow-up of new admissions assigned to social workers by the Supervising Social Worker.

Question # 33

Did the treatment team develop comprehensive initial Needs and Services Plans (NSP) with the child?

Finding:

In four out of six cases, the agency was found not to have developed initial Needs and Services plans without the placed child.

Agency Response:

Secure Transitions, in keeping with Departmental policy, requires that its social workers have children (age-appropriate) participate in the development of the

initial and updated Needs and Services Plans. To correct this deficiency the agency has required stricter supervision of social work staff work and

documentation. The Social Worker Supervisors no longer accepts Plans for which there is no signature of the placed child for whom the Plan has been developed. Additionally, agency social workers have been instructed not to forward Needs and Services Plans to CSW's, but instead, give to the Technical Assistant (TA for mailing. The Technical Assistant no longer forwards any Needs and Services Plan that does not have a placed child's signature. Instead, the TA returns to the agency social worker submitting the Needs and Services Plan any Needs and Services Plan that does not have a child's signature. The agency social worker must then obtain the collaboration of the child and his or her signature before the Plan is forwarded to the appropriate CSW.

Question # 36

Are DCFS CSWs contacted monthly and are the contacts appropriately documented?

Finding:

The agency was found negligent in following this Department policy in six of the six cases reviewed.

Agency Response:

Each child's case file is now reviewed by the 15th of each month by the agency TA to determine if a contact has been made to the child's CSW. If a call has not been made, the agency social worker assigned to that child will be contacted and reminded of the CSW contact. The TA will follow-up by the 25th of the month to ensure compliance. The TA will also inform the Supervising Social Worker of all calls that have not been made by the 25th of the month.

Question # 37:

Did the treatment team develop comprehensive updated Needs and Services Plans (NSP) with the child?

Finding:

In five out of six cases, it was found that the agency did not develop update Needs and Services Plans (NSP) with the child.

Agency Response:

As mentioned above, this deficiency has been addressed. The agency Social Worker Supervisor now no longer accepts any Plans, initial or updated, for which there is no signature of the placed child for whom the Plan has been developed. Additionally, agency social workers have been instructed not to mail Needs and Services Plans to CSW's, but instead, give to the Technical Assistant (TA for mailing. The Technical Assistant has been instructed not mail any Needs and Services Plan that does not have a placed child's signature. Additionally, the TA has been instructed to return to the agency social worker submitting the Needs and Services Plan for mailing, any Needs and Services Plan that does not have a

child's signature. The agency Supervising Social Worker will monitor for compliance.

V. EDUCATION AND WORKFORCE READINESS

Question # 42:

Based on the services provided by the facility, has the child's academic performance and/or attendance increased (e.g., improved grades, test scores, promotion to the next level, H.S. grad, IEP goals)?

Finding:

In four out of five cases reviewed, there was evidence that four placed children have experienced improvement in his or her academic performance and/or attendance.

Agency Response:

The cited deficiency was due to lack of documentation. Agency social workers have been instructed to document the academic progress of each child on his/her caseload in Quarterly Reports; this is monitored for compliance by the Supervising Social Worker.

Question # 44:

Are current copies of the children's report cards or progress reports maintained?

Finding:

In only one out of five cases reviewed was there a school progress report maintained in a child's file.

Agency Response:

The agency's Technical Assistance maintains a computer file on all children placed with the agency indicating if a child's progress report has been submitted and for what school term. To address the cited deficiency, the TA will now submit to the Supervising Social Worker at the end of each school term/semester the name of each child for whom progress reports have not been submitted. The Supervising Social Worker in turn, will notify each agency social worker to obtain the missing progress reports; the Supervising Social Worker will monitor for compliance.

IX. PERSONAL NEEDS/SURVIVAL AND ECONOMIC WELL-BEING

Question #72

Are children always provided with the minimum monetary allowance?

Finding:

In three out of six cases the agency was found not to have provided children with the minimum monetary allowance.

Agency Response:

In general, all placed children five years of age and older receive monetary allowance. Certified foster parents have been instructed at to provide a minimum monetary allowance to all children five years and older.

XI. PERSONNEL RECORDS

Question #82:

Do social work staff meet the education/experience requirements?

Finding:

The Evaluator found that for our out of five social workers this requirement was not met.

Agency Response

Although the social workers for whom this finding pertains are not identified, the agency nevertheless disputes this finding. In all cases we ensure that all social workers working for the agency meet the required education and experience requirements before working with placed children. The agency's Program Administrator will continue to monitor for compliance.

Question # 84:

Do required employees have a valid drivers' license?

Finding:

The agency was cited as having one out of five employees without a driver's license.

Agency Response:

The agency ensures that all social workers transporting children have a valid driver's license. A copy of the driver's license in question was placed in the employee's file approximately three or four days after the exit interview.

Question # 85

Have appropriate FFA employees signed copies of the FFA policies and procedures?

Finding:

Five out of five employee files reviewed did not contain signatures on copies of the FFA policies and procedures.

Agency Response:

All employees will now be required to sign copies of the agency's policies and procedures at the time of hire.

Question 86:

Have appropriate employees receive the required initial training?

Finding:

The agency was found in four out of five cases that employees had not received initial training.

Agency Response:

All social work staff are provided an orientation immediately after hire. The agency obviously did not document this orientation appropriately. This had been corrected.

Question # 87:

Have appropriate employees received minimum of one-hour training in the area of child abuse identification and reporting?

Finding:

The Evaluator found that five of five employees had not received a minimum of one-hour training in child abuse identification and reporting.

Agency Response

The agency provides a minimum of one hour of training in child abuse identification and reporting annually. Training had not been done at time of Evaluator's review. Training was conducted approximately one week following the exit interview.

Question # 90:

Have appropriated employees received the required on-going training?

Finding:

Two employees were found to have not received the required on-going training?

Agency Response:

Unable to determine to whom this finding applies. Typically, social work staff receive at least three hours of on-going training each month as part of the agency's general staff meetings; the Program Administrator provides this training. The agency will continue to provide training in this forum to ensure that social workers receive the required training.